REMARKS/ARGUMENTS

Applicants amended the Specification to correct a minor grammatical error.

The Examiner objected to the numbering of claims 25-43 and renumbered them as claims 24-42. This corrected renumbering is reflected in the list of claims above.

Applicants further amended certain claims to change their dependency from the renumbered claim.

Applicants amended claims 4, 18, and 32 to correct minor errors.

Applicants canceled claims 13, 27, and 41 to overcome the Examiner's objection to these claims.

The Examiner rejected claims 1-3, 5, 7, 8, 10-17, 19, 21, 22, 24-31, 33, 35, 36, and 38-42 as obvious (35 U.S.C. §103) over Rivette (U.S. Patent No. 6,018,749) in view of Barry (U.S. Patent No. 6,606,165). Applicants traverse.

Claims 1, 15, and 30 concern processing a source document in a structured document format including elements providing source content to render, wherein the source content comprises code that is rasterized into output, and require: receiving the source document; receiving a layout data structure providing formatting properties specifying a layout and format of the content output; processing the source document and the layout data structure to determine formatting properties, including page divisions, for the content in the source document; generating multiple page objects, wherein each page object includes source content and formatting properties for one page; and transmitting the page objects to a rasterizer to transform into renderable information capable of being generated by an output device.

Applicants amended claim 15 to recite the "output device" as a direct element of the claim and amended claim 30 to include the antecedent basis for the "output device" in the preamble.

The Examiner cited col. 3, line 30 to col. 5, line 12 of Rivette as teaching the claim requirement of processing the source document and the layout data structure to determine formatting properties, including page divisions, for the content in the source document. (Office Action, pg. 4) Applicants traverse.

The cited col. 3 discusses that text and image files are synchronized to produce Equivalent Files to create an equivalence relationship between the text and image files for

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documents. (Rivette, Col. 3, lines 30-43) The user may display, manipulate, navigate, search, annotated, etc. (Rivette, col. 4, line 1-30) The user may display an image, such as a patent drawing, by placing a cursor next to the text of the Equivalent File and select an element number in a patent drawing. (Rivette, col. 4, lines 37-55)

The cited Rivette discusses an Equivalent File that provides information on an equivalence relationship between text and image files for a document, such as a patent document having text and images. Nowhere does the cited Rivette anywhere teach or suggest that a layout data structure as well as the source document are processed to determine formatting properties, including page divisions, for the content in the source document. Instead, the cited Rivette discusses an Equivalent File, but nowhere suggests processing a layout data structure as well as the source document to determine formatting properties. Instead the cited Equivalent File provides an equivalence relationship between text and image files, but does not teach or suggest that the Equivalent File include claimed formatting properties, including page divisions.

The Examiner cited col. 1, line 24 to col. 3, line 11 of Barry as teaching the claim requirement of generating multiple page objects, wherein each page object includes source content and formatting properties for one page. (Office Action, pg. 4) Applicants traverse.

The cited cols. 1-3 discuss a tandem print engine to process a print job, where the parts of the complex print job are routed to the print engines. (Barry, col. 1, line 56 to col. 2, line 7). The cited Barry further discusses using a device independent color space. The cited Barry further discusses storing bit-mapped images each formed of page data representing a page in a document downloaded from a print file and having print job parameters, and distributing these bit-mapped pages to the print engines.

The claims require generating multiple page objects having content and formatting properties. Applicants submit that the bit-mapped images of Barry cannot teach or suggest the claimed multiple page objects because Barry does not teach or suggest that the bit-mapped images of Barry are rasterized to transform into renderable information capable of being generated by a printer device. Thus, the cited Barry does not teach or suggest page objects that are sent to a rasterizer to transform into renderable information as claimed.

Further, the claims require that the multiple page objects are generated by processing the source document and a layout data structure to determine formatting properties, including page

divisions, and then generating multiple page objects including source content and formatting properties for one page. Nowhere does the cited Barry teach or suggest that the cited bit-mapped images are generated by processing a source document and layout data structure to determine formatting properties, including page divisions, and then generating page objects including the source content and formatting properties. This claimed sequence of operations and information that is processed to generate the page objects is not taught or suggested anywhere in the cited Barry.

Further, modifying the cited Rivette with the cited Barry also does not each or suggest the claimed combination. Rivette discusses an Equivalent file providing equivalence relationship between text and image files and Barry discusses stored bit map images. Thus, combining Rivette's Equivalent File with Barry's bit map images from page data still does not teach the claimed combination of processing the source document and a layout data structure to determine formatting properties, including page divisions, and then generating multiple page objects including source content and formatting properties for one page.

Accordingly, claims 1, 15, and 29 are patentable over the cited art because the cited combination of art does not teach or suggest all the claim requirements.

Claims 2, 3, 5, 7, 8, 10-14, 16,17, 19, 21, 22, 24-29, 31, 33, 35, 36, and 38-42 are patentable over the cited combination of Rivette and Barry, because they depend from one of claims 1, 15, and 30, which are patentable over the cited art for the reasons discussed above. Certain of these dependent claims provide additional grounds of patentability over the cited art for the reasons discussed below.

Claims 2, 16, and 30 depend from claims 1, 15, and 30 and further require that the source document includes statements in a first presentation language and transforming the source document and source content therein into a result document in a second presentation language, wherein the result document includes the source content and the formatting properties provided by the layout data structure, wherein the formatting properties indicate page divisions of the content, and wherein the multiple page objects are generated from the result document.

The Examiner cited the above discussed cols. 3-5 of Rivette as teaching the claim requirement of transforming the source document and source content therein into a result document in a second presentation language and includes formatting properties (page divisions)

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provided by the layout data. The cited Rivette discusses Equivalent Files that include equivalence relationship between text and image files. Nowhere does the cited Rivette anywhere teach or suggest transforming the source document into a result document in a second presentation language including source content and formatting properties provided by a layout data structure, including page divisions. Nowhere does the cited Rivette teach or suggest that the equivalent information in the Equivalent File includes the content and formatting properties from a layout data structure in a second presentation language as claimed .

Moreover, the cited Barry also does not disclose a result document including formatting properties and source content in a second presentation language different from the first presentation language of the source document. Instead, the cited Barry discusses bit mapped images formed of page data representing a page in a document. Although the cited bit map images of Barry represent pages, nowhere does Barry teach or suggest that the bit mapped images include formatting properties , including page divisions, provided by a layout data structure as claimed.

Accordingly, claims 2, 16, and 31 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art.

Claims 3, 17, and 31 depend from claims 2, 16, and 31 and further require that the layout data structure comprises a separate document from the source document.

The Examiner cited the above discussed cols. 3-5 of Rivette as teaching generating a result document to include formatting properties from a layout data structure that is separate from the source document. The cited Rivette discusses an Equivalent File including equivalence relationship between text and image files. Nowhere does the cited Rivette anywhere teach or suggest that the Equivalent File is generated to include the formatting properties determined from a layout data structure that is separate from the Equivalent File. Instead, the cited Rivette mentions that the text and image files are synchronized to produce Equivalent Files using heuristic algorithms to create the equivalence relationship, which does not teach or suggest a layout data structure providing formatting properties as claimed.

Accordingly, claims 3, 17, and 31 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art.

Claims 5, 19, and 33 depend from claims 2, 16, and 30 and further require that the page objects include formatting properties in a third presentation language. The Examiner cited the above discussed image bitmap in the cited cols. 1-3 of Barry as teaching this claim requirement. Applicants submit that although the image bitmap represents one page of data, nowhere does the cited Barry anywhere teach or suggest that the source document is in a first presentation language, that the result document including information on the source content and formatting properties is in a second presentation language, and that page objects generated from the result document is in a third presentation language. Thus, although the bitmap image may itself be in a presentation language, the cited art does not teach or suggest the claimed additional requirements, such as that the source document and result document are in first and second presentation languages.

Accordingly, claims 5, 19, and 33 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art. Similarly, claims 7, 21, and 36 are patentable over the cited art for the reasons discussed with respect to claims 5, 19, and 34 because they include similar claim requirements.

Claims 8, 22, and 36 depend from claims 2, 16, and 30 and further require that the page objects include content and formatting properties in the second presentation language. The Examiner cited the above discussed cols. 3-5 of Rivette as teaching the additional requirements of these claims. (Office Action, pg. 5) Applicants traverse.

The cited Rivette discusses an Equivalent File including equivalence relationship between text and image files. Nowhere does the cited Rivette teach or suggest that the Equivalent File is in a different presentation language (i.e., second presentation language) than the source documents in a first presentation language. Instead, the cited Rivette mentions that the Equivalent File has equivalence relationship, but does not teach anything on whether the Equivalent File is in a presentation language different from the presentation language of the source documents, e.g., text or images.

Accordingly, claims 8, 22, and 36 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art.

Claims 10, 24, and 38 depend from claims 1, 15, and 29 and further require that the page objects include content and formatting properties in a device independent presentation language.

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The Examiner cited the above discussed cols. 3-5 of Rivette as teaching the additional requirements of these claims. (Office Action, pg. 5) Applicants traverse.

The cited Rivette discusses an Equivalent File including equivalence relationship between text and image files. Nowhere does the cited Rivette teach or suggest that the Equivalent File includes content and formatting properties in a device independent presentation language as claimed. Instead, the cited Rivette mentions that the Equivalent File has equivalence relationship between text and image files, but does not teach or suggest that the Equivalent File is in a device independent presentation language as claimed.

Accordingly, claims 10, 24, and 38 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art.

Claims 12, 26, and 40 depend from claims 1, 15, and 29 and further require that the source document and page objects include the formatting properties in a same presentation language. The Examiner cited the above discussed cols. 3-5 of Rivette as teaching the additional requirements of these claims. (Office Action, pg. 5) Applicants traverse.

The cited Rivette discusses an Equivalent File including equivalence relationship between text and image files. Nowhere does the cited Rivette teach or suggest that the equivalence information in the Equivalent File is in a same presentation language as the source document, which in Rivette is the text and image files. Instead, the equivalence relationship information in the Equivalent files is created using heuristic algorithms. (Rivette, col. 3, lines 40-45)

Accordingly, claims 12, 26, and 40 provide additional grounds of patentability because the additional requirements of these claims are not taught or suggested in the cited art.

The Examiner rejected claims 4, 6, 9, 18, 20, 23, 32, 34, and 37 as obvious (35 U.S.C. §103) over Rivette in view of Barry and further in view of Sall ("FOP: Formatting Object to PDF Translator", by James Tauber). Applicants traverse.

Claims 4, 6, 9, 18, 20, 23, 32, 34, and 37 are patentable over the cited art because they depend from one of claims 1, 15, and 29, which are patentable over the cited art for the reasons discussed above.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-43 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0563.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: <u>August 18, 2004</u>

By:_____
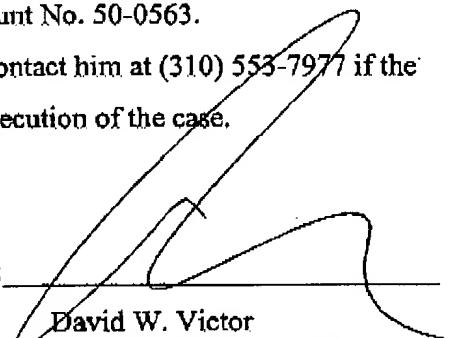
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